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EG&G ROCKY FLATS PLANT GORRESPONDENCE CONTROL

ER:KM:08033

Operable Unit 7 Seep Collection Proposed Action Memorandum Wetlands Assessment

Patricia Powell, Environmental Guidance Division, RFFO

Operable Unit (OU) No. 7 will begin construction of the seep collection system in the summer of 1995. The construction will take place at a wetlands area. Mitigation for the wetlands disturbance will either be achieved via mitigation already in place at the Standley Lake Protection Project (Environmental Protection Agency (EPA) approval requested, response pending) or will be combined with mitigation for the final landfill closure. Either option will require approval of the EPA's Waste Management Division as Clean Water Act authority is delegated to this division per CERCLA.

The 10 CFR Part 1022 requirements have been satisfied with the publication of the Notice of Involvement in the Wednesday, January 27, 1993, Federal Register and completion of the attached wetlands assessment. Once approved, the attached wetlands assessment will be made a part of the administrative record for OU 7.

If you have any questions or comments, please call Kurt Muenchow at 966-2184.

Kurt Muenchow

Environmental Restoration

Attachment

cc w/ Attachment:

L. Eckman, EM-453, HO

F. Lockhart, ER, RFFO

K. Muenchow, ER, RFFO

E. Mast. EG&G

L. Peterson-Wright, EG&G

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RF-46522 (Rev.9/94)

Wetlands Assessment for Operable Unit 7 Seep Collection System Project

1.0 Project Description

The Department of Energy (DOE) proposes a project at the Rocky Flats Environmental Technology Site (RFETS), located north of Golden, CO, portions of which would take place in wetlands. The project requires construction of a seep collection system to collect surface water draining from the east face of the present landfill (Individual Hazardous Substance Site 114) in Operable Unit 7. The objective of the interim action is to significantly reduce potential risks to the public and the environment posed by organics and metals present in the seep.

Liquid will be collected at the seep (SW097) with a temporary system, including 6-inch perforated PVC collection pipe, drain rock, a precast manhole base section, and a submersible pump. The 6-inch perforated PVC collection pipe will be placed just downstream of the seep and backfilled with drain rock to direct the seep flow to the precast manhole. A 1-horsepower pump will deliver the flow to the storage facility via a 2-inch double wall PVC forcemain. A temporary diversion dike consisting of hay bales, liner material and rip rap will be placed upstream of the seep to prevent surface water runoff and sediments from entering the seep collection system. Two double contained crosslink polyethylene tanks will provide a storage capacity of 13,000 gallon each. The stored seep water will be transported as necessary to the designated treatment facility by tanker truck.

Construction is scheduled for May to August 1995. The collection system will operate until July 1997 when the Present Landfill will be capped.

The East Landfill Pond and some areas along the pond edge exhibit typical wetland 'characteristics. Part of the seep collection system will be located in a wetland area at the upstream end of the pond. The collection system must be located in that area in order to collect the seep. Consequently, Title 10, Part 1022, Compliance with Floodplain/Wetlands Environmental Review Requirements has been identified as a potential ARAR. Mitigation of wetland effects will be addressed during the forth-coming Landfill Closure Interim Measure/Interim Response Action Decision Document (IM/IRA DD).

2.0 Wetlands Effects

The proposed activities would have only negligible positive or negative, direct or indirect, short or long term effects on the survival, quality, or natural and beneficial values of the wetlands.

Construction of the seep collection system will remove less than 2 yd² of wetland vegetation to allow for excavation and placement of the downgradient barrier. Also, some flattening of wetland vegetation is expected to occur due to backhoe access and operational maneuvering. The seep collection system may disrupt the local hydrology by removing water that would otherwise remain in the environment, that could result in eventual encroachment of upland vegetation. Approximately 2 yd² of wetland could be affected by eventual encroachment of upland vegetation.

All water removed from the seep will be treated and discharged to the Woman Creek Drainage.

3.0 Alternatives

The no action alternative is the only other action considered feasible for this project. The no action alternative would not result in any adverse impacts to wetland areas. However, the surface water seep contains a listed waste (FO39) as defined by the Code of Federal Regulations, Title 40 Part 261.31, Hazardous Wastes from Non-Specific Sources, and as such, will be collected and treated.

4.0 Mitigation of Wetland Impacts

The impact on wetlands will be minimized by shoring the trench rather than excavation with a standard 1:1 slope. In addition, existing roads will be utilized where possible and access to the site will be limited to authorized personnel only.

